

EXHIBIT 1

Charles Robinson
March 23, 2005

1 Q. Okay. With regard to comments, can you
2 tell me every comment you believe indicates that
3 your layoff was a result of your age?

4 A. Again, any time that he asked me,
5 Mr. Pilat -- and again, he didn't ask me, he was
6 basically making a statement, and again, he would
7 say You're old enough, you would retire if an offer
8 was made.

9 This started from the first time that I
10 -- you know, went up to the NMC, and it wasn't just
11 in conversation.

12 Q. When you say it wasn't just in
13 conversation, what do you mean?

14 A. I didn't have that feeling because it was
15 said to me numerous times over the first couple
16 months, two or three months that I was there, in
17 fact, so much so that I told him to stop that type
18 of questioning of me because I had seen that type of
19 questioning in the past.

20 I did not want to be identified as a
21 possible retiree.

22 Q. Where had you seen that kind of
23 questioning before?

24 A. I had gone through RIF's before.

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1 Q. And so you're saying that in the past,
2 people asked you whether you wanted to retire?

3 A. No. I saw older coworkers being asked
4 that question.

5 Q. Whether they wanted to voluntarily leave
6 the company?

7 A. No.

8 Q. Whether they wanted to retire?

9 A. Not that question, but basically -- yes
10 on that idea, yes. They would -- yes.

11 Q. Well, tell me if you remember any of the
12 specifics of what this prior questioning involved;
13 in other words, can you remember any occasion where
14 that occurred and who was involved?

15 A. Again, I can just remember back years and
16 with the first RIF and I remember again it wasn't a
17 voluntary thing. It was basically people that were
18 the oldest workers there that were the ones that
19 were let go.

20 Q. When you say the first RIF, what time
21 were you talking about?

22 A. That goes back probably fifteen years.

23 Q. Okay. Do you remember any specifics at
24 any time with regard to what was said and by whom

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1 concerning this prior questioning about retirement?

2 A. I don't really recall anything else.

3 Q. So you don't recall any -- any names?

4 A. Oh, who, of people that I just provided.

5 Q. Yeah, of people who were -- who did the
6 questioning, do you have any memory of any names of
7 the people who did the questioning?

8 A. I don't recall, no.

9 Q. Okay. And do you have any names of any
10 of the persons who were questioned?

11 A. I would say, again, I know people that
12 were --

13 MR. FRAGOMENI: Give him the names.

14 THE WITNESS: Thomas Kennedy and Al
15 Spagnoli.

16 Q. (By Mr. Springer) And when was that?

17 A. Years ago, I don't know exactly when.

18 Q. Okay. And do you know what specifically
19 was asked of them?

20 A. No, I don't.

21 Q. And do you know -- and you don't know who
22 asked it of them?

23 A. No.

24 Q. Okay. And do you know whether this was

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1 an involuntary or voluntary layoff they were
2 involved in -- or both?

3 A. It was an involuntary layoff.

4 Q. Okay. And when you say fifteen years ago
5 that -- that's the first layoff that you remember,
6 about fifteen years ago?

7 A. Again, I don't know specifically the time
8 frame; it could have been ten years ago.

9 Q. Okay. And do you know everyone who was
10 laid off in that layoff?

11 A. In my particular area that I was involved
12 with, you know, my general circle of people, no --
13 the -- those are two names that I've provided you.

14 Q. Okay. And I'm asking -- so you don't
15 know everybody?

16 A. I don't know every single person, no.

17 Q. Do you know how many people were laid off
18 in that layoff?

19 A. No, I don't.

20 Q. Okay. And just so I'm clear:

21 What do you remember being said to
22 Mr. Kennedy and Mr. Spagnoli that you over --

23 Did you overhear this or did they tell
24 you?

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1 A. They basically told me that, you know,
2 and again, I just -- it's again --

3 MR. FRAGOMENI: Answer his question,
4 please.

5 THE WITNESS: I over -- I didn't
6 overhear it. I was told this.

7 Q. (By Mr. Springer) What did they tell
8 you?

9 A. That they were basically being asked to
10 retire.

11 Q. Do you remember -- know if a question was
12 asked of them?

13 A. I don't know specifically, no.

14 Q. Do you know if they were asked whether
15 they wanted to retire?

16 A. I don't know specifically, no.

17 Q. Okay. So you don't know what was said to
18 them at all --

19 A. That's correct.

20 Q. -- at all; is that correct?

21 MR. FRAGOMENI: Objection.

22 THE WITNESS: I don't recall the
23 specifics of the conversation, no.

24 Q. (By Mr. Springer) Now, you say Mr. Pilat